PLUMB DEVELOPMENT L.C.

May 29, 2007

Summit Engineering
County Engineer
Derick Radke
PO Box 128
Coleville, UT 84017

Dear Derick,

One of the requirements for out map on Silver Gates Phase II was a notation on the plat referring to hazardous waste. The history of the Pace Dairy Farm (pertaining to the hazardous waste) in a nutshell is as follows. Park City wanted to purchase a portion of the Pace water rights. The Pace's refused to sell unless Park City bought that portion of their property directly in the Silver Creek drainage, which had a higher metal content. Park City agreed and bought a portion of the water rights plus that part of the farm that may have had a hazardous waste problem. I, initially along with others, advised the Pace's on the issue of hazardous waste, because I was not interested in purchasing property with a hazardous waste problem.

After the transaction with Park City, I made a contract and arrangement with the Pace's to purchase and develop the property. Recently I received your request for a plat note on phase II referring to hazardous waste. Since there is no hazardous waste on the property, it seemed to me to be unnecessary. Since I had already been through this once, I recently hired Granite Environmental to actually test the farm again. The results are enclosed. There is absolutely no need for a provision on the plat describing potential hazardous waste. The remaining portion of the Pace Ranch which I purchased is clean. Should you have any further questions place do not hesitate to contact me. There may be other land owners affected by the Silver Creek drainage, but we are not among them.

Thank you,

Walter J Plumb III

cc: Stantec
Stanley Pace
Jamie Braken

801.532.2834 » 801.364.6039 » 801.322.4055 Fax 809 Edgehill Road Salt Lake City, UT 84103

May 24, 2007

Walter Plumb III
90 South 400 West #360
Salt Lake City, Utah 84101

Subject: Pace Ranch
Soil Sampling for RCRA Metals
Granite Project No. 0356-022

Dear Mr. Plumb:

At your request, Granite Environmental, Inc. collected 30 soil samples from the above-referenced property, in order to ascertain whether metals levels in the soils may be present at potentially harmful levels. We analyzed the samples for the eight RCRA metals. Mercury was not analyzed, as it is not part of the RCRA metals suite; however, if metals enrichment (including mercury) has occurred, it should be evident by an increase in the RCRA metals.

Granite reviewed a document prepared by Utah Division of Environmental Response and Remediation (undated but presumably 2002 or 2003) entitled "Innovative Assessment Analytical Results Report, Lower Silver Creek, Summit County, Utah," which analyzed soils, sediment and water for smelting/mining wastes from Silver Creek in the vicinity of the Pace Ranch. Granite attempted to duplicate the sample collection protocol used by DERR, so as to ensure that the data collected by us would be comparable to that of DERR. To wit, all samples were collected at 6 inches below the ground surface, the same as for the DERR study.

Sample locations were designated by letters of the alphabet (A to I). Samples A to E were taken along the west boundary of the property, from the lowest to highest elevations. Samples F to I assessed irrigation ditches entering the property, with their source being Silver Creek (see attached figure). Samples were usually collected in groupings of three (1 being at the lowest elevation and 3 being the highest). For example, I-1 was taken below an irrigation ditch crossing the property; I-2 in the ditch, and I-3 above the ditch. In this way, we hoped to determine if metals-contaminated water was carried in the ditch; if so, to what degree it has impacted the pasture irrigated by the ditch; and what the background levels of metals were at that location (upgradient sample).

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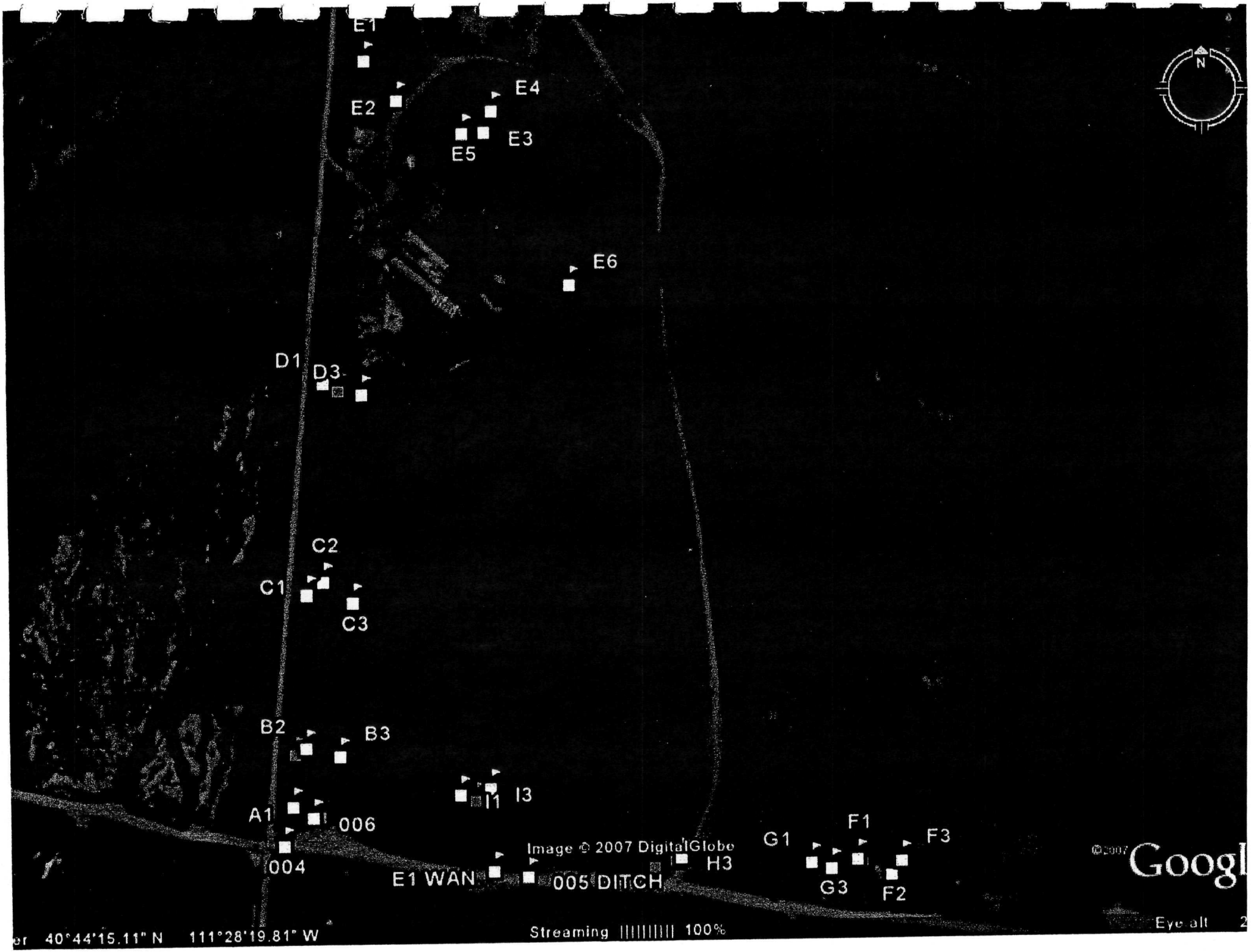
DERR used, as a hazard standard, 400 ppm lead, the same level as the proposed EPA Region 9 residential threshold, and 23 ppm arsenic, which is well above the proposed EPA Region 9 threshold, but is in line with naturally occurring levels in Utah. The lead standard was exceeded only in sample A-2, which measured 410 ppm. This was collected in the southwest property corner near the old stockyards, where soils may have been imported. Otherwise, the highest lead concentration was 350 ppm (B-3). (Actually, sample A-1 reported lead at 540 ppm, but this sample was collected between the western boundary fence and the Rail Trail.) Arsenic was exceeded at B-3 (31 ppm), which is also in the stockyards area, and had somewhat elevated lead. Otherwise, all samples tested below thresholds. Granite intends to resample the area of A-2 and B-3 to see if the results were anomalous or indicative of the stockyards area.

It is Granite's general conclusion that the Pace Ranch has not been subject to metals enrichment of the soils, and that there is no risk to humans who may, in the future, reside there.

Sincerely,

Granite Environmental, Inc.

Jack A. Elder, Ph.D.
President


E1
E2
E4
E3
E5
E6
D1
D3
C2
C1
C3
B2
B3
I1
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